

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jane Doe,

Plaintiff,

Case No.: Doe v. Black, Case No.:23-cv-06418 (JGLC)

- against -

Leon Black,

Defendant.

Jane Doe
P.O. Box 286
Haymarket, VA 20168
202-407-6947
jane.doe06418@gmail.com

April 30, 2025

Via Email to: Temporary_Pro_Se_Filing@nysd.uscourts.gov

The Honorable Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 11B
New York, NY 10007

Re: *Doe v. Black*, Case No.: 23-cv-06418 (JGLC)
Request for Emergency Conference and Leave to Submit Materials Under Seal/In Camera

Dear Judge Clarke:

I write as the pro se Plaintiff in the above-captioned matter to request an emergency conference and leave to submit sensitive materials under seal or for in camera review. This request concerns recent and extremely distressing information I have obtained about discovery actions undertaken by my former counsel, Wigdor LLP, who withdrew on April 4, 2025, without my knowledge or consent and in a manner that may have placed me at risk.

Specifically, on the evening of April 29, 2025, I learned that my former attorneys used highly sensitive and confidential information that I shared with them in confidence to subpoena numerous third parties. I was not informed of this discovery activity while they represented me, and I had raised explicit safety concerns about the disclosure of such information. I only recently became aware of these actions after reviewing documents not previously disclosed to me.

These revelations raise serious concerns implicating both my personal safety and my rights as a litigant. They also appear to involve substantial violations of professional conduct rules, including:

- Breach of Confidentiality (ABA Rule 1.6 / NY Rule 1.6)
- Failure to Communicate Material Developments (Rule 1.4)
- Violation of Client Autonomy and Loyalty (Rules 1.2 & 1.7)
- Potential Abuse of the Discovery Process (Rules 3.4 & 4.4)

Because of the seriousness of these issues, and the potential danger of public disclosure, I respectfully request an emergency conference and that the Court permit me to appear ex parte and/or submit supporting materials in camera or under seal, solely for the purpose of raising safety and confidentiality concerns. This request is made in good faith and not to prejudice the opposing party, but to protect sensitive information, safeguard my well-being, and ensure the safety of my family and me.

Subject to my out-of-state location, I respectfully request permission to appear by video or telephone. I am available to do so promptly and will comply with any schedule or format the Court may require. I make this request in good faith to protect both my safety and the integrity of these proceedings.

Thank you for your consideration.

Respectfully submitted,

/s/ *Jane Doe*

Jane Doe
Pro Se Plaintiff